

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**FRANCIS BILLER, RAYMOND DOVE,
CHESTER ALVAREZ, TROY GRAN-
BROOKS AND JUSTIN PLAIZIER,**

Defendants, and

**LIA PATRICIA SEPULVEDA
SALAZAR, EDWARD LOPEZ
GIRALDO, EDWARD CLARKE AND
SHREDDERZ INTERNATIONAL
CORP.,**

Relief Defendants.

**Civil Action No. 1:22-CV-1406-KAM-
CLP**

**PLAINTIFF'S NOTICE OF DISMISSAL
AS TO RELIEF DEFENDANTS LIA PATRICIA SEPULVEDA SALAZAR AND
EDWARD LOPEZ GIRALDO**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A), plaintiff Securities and Exchange Commission ("Commission") hereby provides notice of its dismissal of its complaint without prejudice as to relief defendants Lia Patricia Sepulveda Salazar ("Salazar") and Edward Lopez Giraldo ("Giraldo"). The Commission's motion relates only to Count 4 of the Complaint (unjust enrichment and constructive trust), as that count pertains to relief defendants Salazar and Giraldo.

The Commission has been unable to confer with Salazar or Giraldo or counsel for either of them because it has been unable to serve or contact Salazar or Giraldo. The Commission attempted to serve both Salazar and Giraldo in Colombia pursuant to the Hague Convention on the Service Abroad of Judicial And Extrajudicial Documents in Civil or Commercial Matters, but

was unsuccessful. Further, the Commission was unable to contact them at their last known addresses. As a result, the Commission does not expect to be able to serve either Salazar or Giraldo in this case.

Dated: January 23, 2025

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION,

By its attorneys,

/s/ Kathleen B. Shields

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SECURITIES AND EXCHANGE COMMISSION

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CERTIFICATE OF SERVICE

I certify that, on January 23, 2025, a true and correct copy of the foregoing document and the supporting declaration and exhibits were filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notice in this case.

The Commission will send email copies of the foregoing document to the following individuals (or to their criminal counsel), who are not represented in this case or registered to receive electronic notices: Francis Biller, Chester Alvarez, Troy Gran-Brooks and Justin Plaizier. In addition, the Commission will email copies of the foregoing document to defendant Raymond Dove, and relief defendants Edward Clarke and Shredderz International Corp., who have not appeared in this case.

/s/ Kathleen B. Shields

Kathleen B. Shields